

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move the court to dismiss with prejudice these actions and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

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EXHIBIT A

2:13-cv-9244	Sorenson v. Ethicon
2:13-cv-4241	Mattice v. Ethicon
2:14-cv-00899	Gaston v. Ethicon
2:14-cv-00914	Shiflet Czerwinski v. Ethicon
2:14-cv-00242	Coletta v. Ethicon
2:14-cv-00247	Dukes v. Ethicon
2:12-cv-8673	Vinar Maxfield v. Ethicon
2:14-cv-12877	Allen McGilvray v. Ethicon
2:15-CV-08441	Kirkland v. Ethicon
2:15-cv-14749	Petersen v. Ethicon
2:16-cv-1481	Salmon v. Ethicon
2:14-cv-18942	Dietrich v. Ethicon
2:14-cv-18947	Furr v. Ethicon
2:14-cv-19684	Ramsey v. Ethicon
2:14-cv-00241	Burns-Hurst v. Ethicon
2:13-cv-9233	Grasso v. Ethicon
2:14-cv-907	Jones v. Ethicon
2:13-cv-9235	Nelson v. Ethicon
2:13-cv-9574	Spires v. Ethicon
2:14-cv-19687	Toppin v. Ethicon
2:14-cv-19686	Whitaker v. Ethicon

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage